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and Volkswagen Group of America Finance, LLC*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

IN RE: VOLKSWAGEN “CLEAN  
DIESEL” MARKETING, SALES  
PRACTICES, AND PRODUCTS  
LIABILITY LITIGATION )  
\_\_\_\_\_  
This Document Relates to: )  
BRS v. Volkswagen AG, et al., Case No. )  
16-cv-3435 (“Bondholders Securities )  
Action”) )  
\_\_\_\_\_  
)

) MDL No. 2672 CRB (JSC)  
)  
)

) **STIPULATION AND ORDER EXTENDING**  
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) **DEADLINE FOR DEFENDANTS’ ANSWERS**

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) The Honorable Charles R. Breyer

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This Stipulation is entered into between Defendants Volkswagen AG, Volkswagen Group of America, Inc. and Volkswagen Group of America Finance, LLC (the “Corporate Defendants”), Defendants Michael Horn and Martin Winterkorn (together with the Corporate Defendants, “Defendants”), and Plaintiff Puerto Rico Government Employees and Judiciary Retirement Systems Administration (“Plaintiff”) (collectively with Defendants, the “Parties”).

WHEREAS, on April 2, 2018, Plaintiff filed its Second Amended Class Action Complaint for Violations of the Federal Securities Laws Regarding Volkswagen Bonds (“Second Amended Complaint”) (ECF. No. 4956);

WHEREAS, on May 2, 2018, Corporate Defendants and Martin Winterkorn filed a Motion to Dismiss the Second Amended Complaint (ECF. No. 5021);

WHEREAS, on May 2, 2018, Defendant Michael Horn filed a Motion to Dismiss the Second Amended Complaint (ECF. No. 5019);

WHEREAS, on September 7, 2018, the Court denied Defendants' Motions to dismiss and ordered that Defendants answer the Second Amended Complaint by September 28, 2018 (ECF No. 5339);

WHEREAS, Defendants have not previously requested an extension of their time to answer the Second Amended Complaint

WHEREAS, Plaintiffs do not oppose a 60-day extension of Defendants' time to answer the Second Amended Complaint;

IT IS THEREFORE STIPULATED AND AGREED by the Parties, through their respective counsel of record, that, subject to the Court's approval, Defendants' answers to the Second Amended Complaint will be filed no later than November 27, 2018.

## IT IS SO STIPULATED.

Dated: September 21, 2018

Respectfully submitted,

/s/ *Robert J. Giuffra, Jr.*

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\* \* \*

PURSUANT TO STIPULATION, IT IS SO ORDERED

DATED: September 21, 2018

CHARLES R. BREYER

## United States District Judge